



O & M Enterprises, Inc.

Serving you/protecting our environment

900 S. Vine Street. Holden, Missouri 64040
Ph: (816) 732-4313
FAX: (816) 732-6036

April 9, 2009

The Honorable Larry Cline, Mayor
City of Rockaway Beach
P.O. Box 315
Rockaway Beach, MO 65616

Dear Mayor Cline:

Thank you for allowing us to assist you in the planning and needs assessment for the wastewater system serving the City of Rockaway Beach and surrounding communities. We very much appreciate being called upon to assist in such matters. At O & M we have many years of experience in the water and wastewater industries and share a special concern for the small communities in this area of high quality demand and low resource availability. This letter is only meant to introduce you to the long-term needs for compliance and success with your wastewater utility. More information can be communicated through meetings or work sessions where open discussion and ideas can be shared. Through this process we can develop recommendations with a timetable, goals and plans for achieving those goals.

After reviewing the inspection report from DNR we toured your facilities three times. Doing so we concluded there is simply not enough historic data and information available for us to identify the true efficiency of your facilities nor to pinpoint any certain particular problem. However we have compiled a large laundry list of mechanical and physical deficiencies at this facility that is probably incomplete. The fact that there is no data records available is an indicator of poor operation and maintenance (O & M) practices without looking any further. I suggest that we not focus so much on these individual items at this time, but rather direct our attention towards the larger picture of overall organization and management. Therefore we are not proposing to itemize for you specific changes, or repairs, but rather, offer direction to help the utility develop as a professional organization in the wastewater field that can prioritize, manage, and eliminate these unsatisfactory items. However, we have prepared an O & M guide, or manual, that will be implemented as a starting point when we are prepared to staff this facility. There are copies for your review that I hope will help you to understand the responsibilities we will encounter operating this facility.

In preparing our recommendations we enlisted services from Kevin Schrader P.E. of Wastewater Technical Services, LLC, to quantify and identify the flows and facilities from an engineering point of view, and help to determine if the physical facilities are designed to do what is expected in this process. Kevin's unique combination of

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experience in operations and engineering is reflected in the enclosed O & M manual he has prepared. I assure you, you will not find a more complete start up manual anywhere for a facility like this.

As I indicated in the beginning of this letter, this is only the first step of many, your utility will need to take in the process of building a strong, and efficient wastewater company to serve your citizens with the highest fiscal responsibility while achieving 100% protection to the environment in the management of your communities wastewater.

To prepare you for the next step, you will also find an incomplete draft of a "Budget Summary" reflecting a conservative monthly cost to each of your customers. The "Sludge Management" portion of this draft was a guess and the "Collection System Maintenance" is missing entirely. These two items are under fire by new regulations to all wastewater systems. I would be surprised if whatever maintenance program you have in place now for your collection system is adequate to comply with the Environmental Protection Agencies (EPA's) new Capacity Management Operation & Maintenance (CMOM) program that's showing up in many NPDES permits.

As I mentioned, this is an incomplete assessment of the needed revenues for this utility. If I understand your present rate structure, as we go through this process of change some of your citizens may have questions concerning their wastewater service, some may be shocked, and some may refuse to believe these changes are necessary. It is our goal to help your community to achieve the most efficient solution to your situation without compromising our responsibility to protect the environment. This will require much public education and a full understanding and support of this project by the board.

The information given to you in this first assessment will only introduce you to the challenges. The beginning of this process will take a cooperative plan designed by your administrative body with our professional assistance. The following are activities that are involved in this process, which are not listed in any particular order:

1. Develop and/or implement an organizational structure that will manage and operate this system as a professional business focused to serve the citizens of Rockaway Beach and the surrounding communities as an efficient wastewater utility autonomous from political influences.
2. Educate the administrative body of the responsibility due to your citizens and the seriousness of noncompliance with the Federal and State clean water laws.
3. Educate the Citizens of the value of wastewater service and the need to protect the environment in the disposal of their waste.
4. Produce a complete budget and conduct a comprehensive rate study.
5. Implement adequate utility rates to fund ALL activities of this utility.
6. Staff the organization with professionals in utility administration, wastewater treatment processes, sludge management, and collection system O & M.

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7. Develop a network of professionals in engineering, electronics, mechanics, excavation, equipment venders, and many other areas that the utility will need to call upon from time to time in situations that will arise.

In conclusion, this will be an evolving plan, where changes will be made as more information becomes available. The timetable for completion of this project will also be determined through the group effort. Once all of the board members are aware of what is expected of wastewater utilities we will be prepared to put organizational options on the table for consideration.

Once again we thank you for this opportunity, and are very much looking forward to working with you on this project should you choose to use us in the development of a final plan of operation. I wish we could have presented to you a complete package, but there is just too little data available at this time, and too much public education that needs to be done before such a change can occur with reasonable support from your customers.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tony R. Lerda", with a stylized, flowing script.

Tony R. Lerda
President

**Notice of Potential
National Pollution Discharge Elimination System (NPDES)
PERMIT VIOLATIONS**

Permittee (facility) Name and Address:

ROCKAWAY BEACH WWTP
1000 BOYS CAMP RD.
ROCKAWAY BEACH, MD. 65740

NPDES Permit Number:

MD - 0108162

During the Clean Water Act § 308 compliance inspection conducted on 8/10 - 8/12/09
the potential NPDES permit violations noted below were found. Additional violations may be brought to
your attention following a complete review of the inspection report and other available information.

POTENTIAL NPDES PERMIT VIOLATIONS

- ① Failure to retain copies of Discharge Monitoring reports (Dec 2007, March 2008) and I/I report (Oct. 2008)
- ② Failure to meet Phosphorus limits in July and August of 2008.
- ③ Failure to submit semi-annual I/I report for Oct. 2008 to MDNR.

REQUESTED ACTION: Within ten (10) days, please describe in writing any actions taken, or planned, to correct the potential violations identified above. Your response will be considered in the determination of the need for further administrative or legal action. Mail your description of corrective actions to your inspector at:

U.S. Environmental Protection Agency
ENSV/EMWC
901 North 5th Street
Kansas City, Kansas 66101-2907

Inspector's printed name:

LYLE COWLES

Inspector's signature:

Notice received by:
(name & title)

Date:

August 12, 2009

PERMITTEE

OPERATIONAL CONTROLS/LABORATORY TEST REQUIRED FOR "ACTIVATED SLUDGE" PROCESSES

DATE	INFLUENT		Aeration Basin, O-Ditch, Etc.								Weather	
			East Ditch				West Ditch				* Ambient Temp ° F	*RAIN inches
	* DO mg/l	** MLSS mg/l	*Settleability		* DO mg/l	** MLSS mg/l	*Settleability					
			*30 min ml	Temp ° F			*30 min ml	Temp ° F				
1												
2												
3			0.17		560	53.7	0.20		610	54.2		
4			1.10	4024	560	54.2	0.51	4003	610	54.7	60	
5			1.33		550	52.9	0.74		620	53.4	65	
6			1.01		550	53.4	0.40		620	53.2	70	
7												
8												
9			1.67	3428	590	53.6	1.00		610	53.1	65	
10			1.93		580	53.1	1.32	3431	600	53.9	60	
11			0.66		590	52.9	0.26		610	53.6	35	
12			1.05		570	53.7	0.33		590	54.2	35	
13			0.33		580	54.2	0.21		600	54.7	40	
14												
15												
16			0.22		600	54.6	0.21		620	54.9	65	
17												
18			2.00	3453	610	53.6	1.47	3480	620	54.1	75	
19			0.76		600	53.2	0.36		620	53.9	60	
20			0.30		590	54.7	0.21		640	54.7	50	0.1
21												
22												
23			0.21		610	54.9	0.21		630	54.6	70	
24			0.69		590	55.1	0.26		620	56.4	60	0.2
25			0.43		580	54.6	0.31		600	55.2	55	
26			0.92	3382	570	54.7	0.47	3422	600	55.3		
27			0.21		570	53.9	0.21		600	54.5	55	
28												
29												
30			0.22		600	54.2	0.23		600	54.9	65	
31			0.41		600	53.8	0.24		630	54.1	50	

COMMENTS:

TESTS PERFORMED BY (PRINT)

Rockaway Beach P.D.C. Allen Bush

REPORT APPROVED BY (PRINT)

SIGNATURE

DATE

PHONE #

*Required Daily (Monday - Friday)

**Required 1/week

[illegible]



MISSOURI DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
 Discharge Monitoring Report For Municipal Wastewater Treatment Plants

NAME OF FACILITY Rockaway Beach WWTF					LOCATION ADDRESS & CITY 1000 Boys Camp Road					COUNTY/REGION Taney/SWRO				
MONTH/YEAR Jun-09		PERMIT NUMBER MO-0108162			OUTFALL NUMBER # 001		TYPE TREATMENT FACILITY Two Train Deep Ox. Ditch/Center Clarifiers/UV/Phos. Reduction/Sludge Land App.							
DATE	Influent FLOW GPD	INFLUENT			EFFLUENT								% Removal	
		pH UNITS	BOD mg/l	TSS mg/l	pH UNITS	BOD mg/l	TSS mg/l	Ammonia as N mg/l	TOTAL Phos. as P mg/l	Oil & Grease mg/l	FECAL COLIFORM #/100 ML	BOD	TSS	
1														
2														
3	171.000	7.4			7.2									
4	216.000	7.6			7.3									
5	224.000	7.6			7.2		<2.0		0.48					
6	229.000	7.7			7.2									
7														
8	659.000	7.6			7.3									
9	232.000	7.7			7.2				0.48					
10	258.000	7.6			7.2									
11	158.000	7.6	236.6	266.6	7.2	<4.0	<2.0	0.1		<5.0	30	99.20	98.3	
12	258.000	7.6			7.3									
13														
14														
15	598.000	7.4			7.3									
16	273.000	7.6			7.3				0.46					
17	196.000	7.5			7.2		<2.0							
18														
19														
20														
21														
22	1114.000	7.6			7.3									
23	274.000	7.6			7.2				0.48					
24	191.000	7.7			7.3									
25	241.000	7.6			7.2		<2.0							
26	233.000	7.5			7.2									
27														
28														
29	702.000	7.4			7.2									
30	243.000	7.6			7.2				0.41					
31														
		Weekly Avg.												
6470.000		Monthly Avg.				#DIV/0!	#DIV/0!	0.1	0.5	#DIV/0!	30.0	99.2	98.3	
340.526		Daily Maximum			7.3			0.1		0.0	30.0			
		Daily Minimum			7.2									

ATTACHMENT 12

INVENTORY OF EPA/MONR DOCUMENTS IN DMR Package

Copy
and give
operator →

- ① Discharge Monitoring Report (DMR)
- ② Contract Lab data sheets, bench sheets
headerhead as Report. & bench sheets
- ③ Sampling data: date, time, person collecting
the sample, sample location
- ④ ^{Daily} operational data
- ⑤ removal efficiency calculations
- monthly -

O&M Manual(s) → ^{daily operating} SOP
old & new

Sludge Reports (Annual)

I/I (inflow & infiltration) reports: APR & OCT

Attachment 13, I/I Report & Correspondence
2009

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director

www.dnr.mo.gov

June 8, 2009

City of Rockaway Beach
P. O. Box 315
Rockaway Beach, MO 65740

RE: MISSOURI STATE OPERATING PERMIT MO0108162

Dear Permittee:

Your state operating permit for wastewater discharge referenced above contains a requirement for a/an **Infiltration Report** due **4/28/2009**. This may or may not be in addition to other reporting on parameters or outfalls due on a more frequent basis. **Our records indicate that this report is past due.**

Please review your permit, including any requirements of the Special Conditions section or Schedule of Compliance. If you are unable, after your review, to determine the nature of the annual reporting requirement please contact the Southwest Regional Office, Water Pollution Control Branch at 417-891-4300.

If you have already sent this report we commend you. If you have questions please contact me by calling 417-891-4300 or via mail at Southwest Regional Office, 2040 W. Woodland, Springfield, Missouri 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Lana Cypret

Lana Cypret
Technical Assistant II

For 891-4399

LGC/bjc

213.wpcp.RockawayBeachCityOf.mo0108162.x.2009.06.08.fy09.romit.x.lgc.doc



MISSOURI Department OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY

I & I Report

PART I: FACILITY INFORMATION

city: ROCKAWAY BEACH, Mo.
permit #: MO 0108162
County: TANNEY

If Address Change is Requested: _____

PART II: MONITORING INFORMATION

For The Year of: 2009

Phone Number: 417-561-4484

Date Due: ☐
<date>

PART III: REPORTING INFORMATION

1. Manhole Observation:

Number Observed: 9 From JAN 09 to MAR 09

Results: Manholes Replaced: Yes ☐ No ☒ How many? _____

If so, Type of Manhole Replaced: _____

Results: Manholes Rehabbed: Yes ☐ No ☒ How many? _____

If so, Type of Manhole Rehabbed: _____

2. Smoke Testing:

Linear Feet of Lines Tested: NO From _____ to _____

Results: Lines Cleaned: Yes ☐ No ☐ How many? _____

If so, How was Line Cleaned: Jet _____ Pig _____ Auger _____

Length of type of cleaning: Jet _____ Pig _____ Auger _____

Results: Number of Lines Replaced: _____ Number of Linear Feet: _____

If so, Type of Line Replaced: _____

If different then original, replaced with what type? _____

Results: Number of Lines Rehabbed: _____ Number of Linear Feet: _____

If so, Type of Line Rehabbed: _____

3. CCTV (Closed Circuit)

If so, Linear Feet Viewed: None From _____ to _____

4. Lampholes Observed:

Number: # _____ Replaced: # _____

5. Total # of Sewer System Overflows: 1 Dry Weather _____ Wet Weather _____

6. Total # of Basement Backflows: 0 Dry Weather _____ Wet Weather _____

7. Total # of linear feet of lines for collection system including force mains: 55,700

8. Peak Flow rate 250,000 gallons/day Average Flow rate 180,000 gallons/day

PART IV: CONTACT INFORMATION

Operator Name: (Printed)

Edwin Godley

Report Prepared by:

Edwin Godley

Date:

JUNE 16, 2009

Owner Signature:

Phone: _____

Return Form to: Missouri Department of Natural Resources
Southwest Regional Office
2040 West Woodland
Springfield, MO 65807

Fax Cover Sheet

CITY OF ROCKAWAY BEACH
BOX 315
 Rockaway Beach, Missouri 65740
 (417) 561-4424 Phone
 (417) 561-6025 Fax
rockawaycity@interlinc.net E-mail

Send to: LAWA CYPRIT	From: BUCK GODFREY
Attention:	Date: 6-17-09
Office Location:	Office Location:
Fax Number:	Phone Number:

- ☐ Urgent
- ☐ Reply ASAP
- ☐ Please comment
- ☐ Please Review
- ☒ For your Information

Total pages, including cover: 2

Comments:

Comments:

ATTN:

WADA CYRET

TRANSMISSION VERIFICATION REPORT

TIME : 06/17/2009 14:20
NAME :
FAX :
TEL :
SER.# : 000D5J721144

DATE, TIME	06/17 14:19
FAX NO./NAME	14178914399
DURATION	00:00:58
PAGE(S)	02
RESULT	OK
MODE	STANDARD
	ECM

**ATTACHMENT 14, DOCUMENTS & NOTES FROM
CITY RECORDS FILE**

FedEx USA Airbill

FedEx
Tracking
Number

839706224892

Form
I.D. No.

0200

Sender's Copy

From Please print or type name

Date 11-08-08

Sender's FedEx
Account Number

241-836-878

Sender's
Name

Susan Shoemaker Phone (417) 561-4424

Company

City of Rockaway Beach

Address

P.O. Box 523

Dept./Floor/Suite/Room

City

Rockaway Beach State MO ZIP 65740

Your Internal Billing Reference

First 24 characters will appear on invoice.

To
Recipient's
Name

Ms. Cynthia Sims Phone ()

Company

U.S. Environmental Protection Agency

Address

901 North Fifth Street Reg. 7 We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address

City Kansas City State KS ZIP 66101

Try online shipping at fedex.com

By using this Airbill you agree to the service conditions on the back of this Airbill and in our current Service Guide, including terms that limit our liability.

Questions? Visit our Web site at fedex.com
or call 1.800.Go.FedEx® 800.463.3339.

4a Express Package Service

☒ FedEx Priority Overnight
Next business morning

☐ FedEx Standard Overnight
Next business afternoon

☐ FedEx First Overnight
Earliest next business morning
delivery to select locations

☐ FedEx 2Day
Second business day
FedEx Envelope rate not available. Minimum charge: One pound rate

☐ FedEx Express Saver
Third business day

4b Express Freight Service

☐ FedEx 1Day Freight*
Next business day

☐ FedEx 2Day Freight
Second business day

☐ FedEx 30day Freight
Third business day

* Call for Confirmation:

5 Packaging

☒ FedEx Envelope*

☐ FedEx Pak*
Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak

☐ Other

6 Special Handling

☐ SATURDAY Delivery
Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select ZIP codes

☐ HOLD Weekday
at FedEx Location
NOT Available for
FedEx First Overnight

☐ HOLD Saturday
at FedEx Location
Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations

Does this shipment contain dangerous goods?
One box must be checked.

☒ No ☐ Yes
As per attached
Shipper's Declaration

☐ Yes
Shipper's Declaration
not required

☐ Dry Ice
Dry Ice, 3, UN 1845 x kg

Dangerous Goods (including Dry Ice) cannot be shipped in FedEx packaging.

☐ Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below

☒ Sender
Acct. No. in Section
1 will be billed.

☐ Recipient

☐ Third Party

☐ Credit Card

☐ Cash/Check

FedEx Acct. No.
Credit Card No.

Exp.
Date

Total Packages

Total Weight

Total Declared Value†

\$.00

FedEx Use Only

†Our liability is limited to \$100 unless you declare a higher value. See back for details.

8 Release Signature

Sign to authorize delivery without obtaining signature.

By signing you authorize us to deliver this shipment without obtaining a signature and agree to indemnify and hold us harmless from any resulting claims.

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Sent to May Rept.
DNR - Springfield
07-03-09
DNR - Jefferson City
07-16-09
EPA - Jefferson City
07-16-09